Case 5:06-cv-04327-JW Document 568 Filed 03/04/10 Page 2 of 3

1	WHEREAS, Defendant Ernst & Young LLP ("EY") will file a Motion For
2	Protective Order on March 1, 2010;
3	WHEREAS, Plaintiffs have noticed certain depositions throughout March and a
4	decision on the Motion For Protective Order has bearing on whether those depositions will
5	proceed;
6	WHEREAS, in the interests of efficiency for the Court, the parties, and the third
7	parties potentially being deposed, EY and Plaintiffs propose that the Motion For Protective Order
8	be heard on March 9, 2010, and the parties have agreed to an expediting briefing schedule to
9	accomplish this;
10	NOW THEREFORE, the parties hereby stipulate, and request that the Court
11	order, as follows:
12	1. Any responses to the Motion For Protective Order, whatever those
13	responses may be, shall be filed (and served on all other parties via email) no later than two
14	Pacific time on Friday, March 5, 2010;
15	2. Any reply in support of the Motion For Protective Order shall be filed by
16	Monday, March 8, 2010; and
17	3. A hearing on the Motion For Protective Order shall be held on March 9,
18	2009 at 10:00 a.m.
19	IT IS SO STIPULATED.
20	II IS SO STIPULATED.
21	Dated: March 1, 2010
22	LATHAM & WATKINS LLP
23	LATITAWI & WATKING LEI
24	
25	By <u>/s/ Andrew M. Farthing</u> Andrew M. Farthing
26	Attorneys for Defendant Ernst & Young LLP
27	
28	

	Case 5:06-cv-04327-JW Document 568 Filed 03/04/10 Page 3 of 3
1	Dated: March 1, 2010
2	
3	LOWEY DANNENBERG COHEN & HART, P.C.
4	
5	By/s/ David Harrison
7 8	One North Broadway, 5th Floor White Plains, NY 10601-2310
9	914-733-7228 (telephone) 914-997-0035 (facsimile) Lead Counsel for Lead Plaintiff
10	WILLEM F. JONCKHEER
11	SCHUBERT JONCKHEER & KOLBE LLP Two Embarcadero Center, Suite 1650
12	San Francisco, CA 94111 Telephone: 415-788-4220
13	Local Counsel for Lead Plaintiff
14	In accordance with General Order 45.X, I, Andrew Farthing, attest that David Harrison concurs in the filing of this document.
15	* * *
16	
17	IT IS SO ORDERED, except that any reply papers shall be e-filed by noon on March 8, 2010.
18	
19	Dated: 3/3/10 The Honorable Patricia V. Trumbull
20	
21	
22	
23	
24	
2526	
27	
28	